



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 11 2018

Mr. Ken Taylor
SC Dept. of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

Subject: Galey & Lord Society Hill Plant Site
Society Hill, Darlington County, South Carolina

Dear Mr. Taylor:

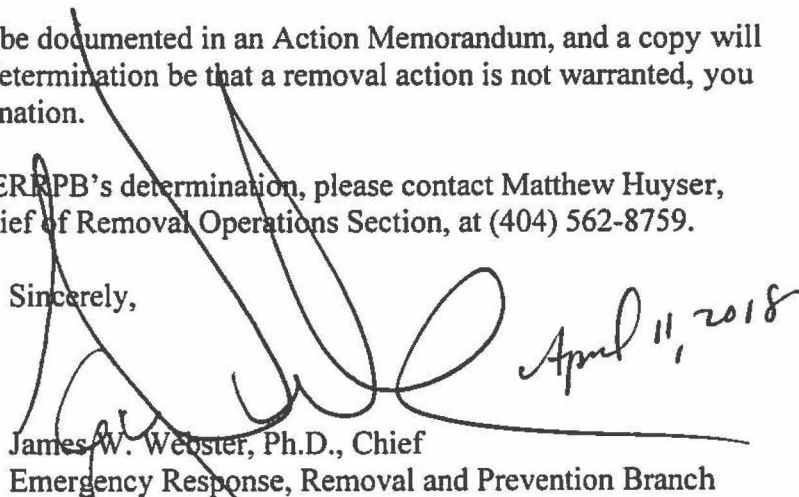
The U.S. Environmental Protection Agency's Emergency Response, Removal and Prevention Branch (ERRPB) conducted a Removal Site Evaluation (RSE) at the above referenced Site for potential removal action eligibility under the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP).

Based on the information collected during the RSE, the On-Scene Coordinator (OSC) recommends this **Site be given priority** for removal eligibility contingent upon availability of approved funds under the EPA's Superfund Removal Program (see enclosed RSE memo). Concurrent with this recommendation, the EPA may also begin its enforcement activities to determine potentially responsible parties for this Site.

A decision to conduct a removal action will be documented in an Action Memorandum, and a copy will be forwarded to the State. Should the final determination be that a removal action is not warranted, you will be subsequently notified of this determination.

Should you have any questions concerning ERRPB's determination, please contact Matthew Huyser, OSC, at (404) 562-8934, or Matt Taylor, Chief of Removal Operations Section, at (404) 562-8759.

Sincerely,


James W. Webster, Ph.D., Chief
Emergency Response, Removal and Prevention Branch

Enclosure

cc: Don Rigger
Tony Moore
Matt Taylor
James Webster
Matthew Huyser
Subash Patel

Tina Terrell
Ronald Saskowski
Rachel McCullough
Greg Armstrong

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Galey & Lord Society Hill Plant Site
Removal Site Evaluation POLREP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP
Removal Site Evaluation
Galey & Lord Society Hill Plant Site
670 North Main Street, Society Hill, Darlington County, South Carolina 29593

Latitude: 34.5291809° North
Longitude: 079.8339476° West

From: Matthew J. Huyser, On-Scene Coordinator
Thru: Matt Taylor, Removal Operations Section
To: James W. Webster, Ph.D., ERRPB
Date: April 4, 2018

1. Introduction

Site Number: C433
Response Authority: CERCLA
Response Type: Time-Critical
Response Lead: EPA
Incident Category: Removal Assessment
NPL Status: Non NPL

1.1 Site Description

The Galey & Lord Society Hill Plant (the Site) is a former textile dye and finishing facility located on approximately 234 acres at 670 North Main Street, Society Hill, Darlington County, South Carolina. According to information provided by the South Carolina Department of Health and Environmental Control (DHEC), the property was originally developed in 1965 by Klopman Mills, a division of Burlington Industries. Burlington sold the facility to Galey & Lord Inc. in 1987. Galey & Lord Inc. was sold to a holdings company, Patriarch Partners, LLC, in 2004; thereafter ownership of the facility was transferred to Galey & Lord, LLC. Operations at the Site ended in the summer of 2016. Two previous Galey & Lord employees remain at the Site with one serving as a security guard and the second serving as a general facilities manager. Demolition and scrapping activities were conducted in 2017 and early 2018 by a third-party contractor.

The Site was developed as a dye and finishing plant for cotton and synthetic fabrics. The facility consists of two main manufacturing buildings (Plant I built in 1965 and Plant II built in 1969), a boiler house, a water treatment plant, a wastewater treatment plant and several chemical storage areas.

1.2 Preliminary Removal Assessment/Removal Site Inspection Results

The boiler house was originally constructed to burn coal and included a coal yard but was later converted for gas combustion, and the coal yards were abandoned. Evidence of coal is still present in two coal pile locations at the Site.

The wastewater treatment plant includes a 20 million-gallon (MG) lagoon, three equalization tanks (2 MG each), three aeration tanks (2.56 MG each), a 17,200-gallon flash mix tank, a 107,700-gallon flocculation tank, two 850,000-gallon clarifiers, a 0.2-acre digester, and a 3.1-acre sludge storage pond. All the water tanks, treatment vessels and impoundments remain full or nearly full of water. An 8.8-acre former aeration pond at the Site has been filled in, and standing water in the pond has been reduced by more than 50% of the original area. The wastewater treatment system was shut down but was not remediated or cleaned following closure of the facility.

Historic contamination at the Site identified by DHEC and the U.S. Environmental Protection Agency includes a chromic acid pit used for disposal, two other small landfills at the Site, coal and coal ash storage and groundwater contamination. A pump and treat system that had been installed to address groundwater contamination ceased operating when the facility closed in 2016. DHEC returned to the Site in October 2016 to conduct a Phase I Environmental Site Assessment and observed several tanks, drums and totes which were full or partially full at the Site.

1.3 Site Location

The Galey & Lord Society Hill Plant is located on approximately 234 acres that is bordered on the east by the Great Pee Dee River and to the northeast by Cedar Creek. Highway 15-401 (aka North Main St.) borders the south of the Site while residential, agricultural and undeveloped properties are located to the west and northwest. The nearest residence is located across Highway 15-401 from the entrance to the facility; approximately 20 additional residences are located within 1,000 feet of the facility entrance. Surface water drainage from the facility enters the adjacent Pee Dee River which is a recreational waterway, serves as a drinking water intake for the City of Florence and adjoins undeveloped wetland ecosystems between the Site and the coastal zone.

2. Removal Site Evaluation

DHEC again visited the Site in 2017 and observed active scrapping and demolition activities at the Site; DHEC also documented that the tanks, drums and totes had not been fully addressed. Based on the presence of these containers and hazardous materials, DHEC requested that the EPA Region 4 Emergency Response, Removal and Prevention Branch (ERRPB) conduct a Removal Site Evaluation (RSE). The EPA On-Scene Coordinator (OSC) Matthew Huyser requested written access from the CEO of Galey & Lord, LLC but did not receive a written reply. A verbal access authorization was eventually granted, and OSC Huyser met with DHEC on February 22, 2018, to conduct a walk-through of the Site. OSC Huyser documented the presence of at least 300 drums plus approximately 100 other totes, cylinders and other containers. The presence of several dozen tanks was confirmed, but tanks in Tank

Farm A, Tank Farm B and an unnamed tank farm on the east side of Plant I appeared to have been removed. Tank Farms C, D, E and F, which are located on the north side of Plant I, were still present, but DHEC reported that several tanks observed in 2017 adjacent to Tank Farm C, which do not appear on the facility diagram, were missing. An updated tank inventory, which was prepared by the facility manager and provided by the security guard, indicated 31 tanks which contain at least some material, including an 800,000-gallon tank of 5% caustic which remains over 30% full. Primary hazardous substances identified during the RSE include caustics, acids and oxidizers.

During the RSE, OSC Huyser and DHEC discovered a 12-inch pipe discharging industrial wastewater to a storm water drain that empties into the Pee Dee River. The rate of discharge was estimated at approximately 4,000 gallons per day. After notifying the CEO of Galey & Lord, OSC Huyser mobilized an EPA Superfund Technical Assessment and Response Team (START) contractor to sample the discharging wastewater. By 8:00 p.m. on February 22, 2018, the facility manager returned to the Site, and by 8:30 p.m. the facility manager was able to reseal the pipe and close the tank valve thereby reducing the discharge rate to an intermittent drip. Collected water samples were analyzed for volatile organic compounds (VOC), semi-volatile organic compounds (SVOC) and metals. Results did not yield the presence of any elevated concentration of constituent(s) within these analyte groups.

On March 1, 2018, an asbestos investigator with DHEC visited the Site. DHEC obtained a copy of an asbestos survey that was conducted prior to demolition and scrapping work. DHEC reported to OSC Huyser that the department had not issued a permit for asbestos work at the Site. The investigator collected samples for asbestos analysis and later confirmed that asbestos had been disturbed during the demolition and scrapping activities.

3. Recommendation

The tank inventory and observed containers at the Site confirm the presence of hazardous substances which have effectively been abandoned. The discovery of leaking water from the wastewater treatment plant indicates that these materials are capable of being released to the environment due to deterioration and that the security guard and single facility manager are insufficient measures to identify and secure such a release.

Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) lists factors to be considered in determining the appropriateness of a removal action. Paragraphs (b)(2)(i), (iv), (v) and (vii) directly apply to the Site:

300.415(b)(2)(i): Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants; OSC Huyser documented the presence of at least 300 drums plus approximately 100 other totes, cylinders and other containers at the Site. An updated tank inventory indicated 31 tanks which contain at least some material, including an 800,000-gallon tank of 5% caustic which remains over 30% full. Primary hazardous substances identified during the RSE include caustics, acids and oxidizers. Sodium Hydroxide and Acetic Acid are listed as CERCLA hazardous substances under 40 CFR section 302, Table 302.4. During the RSE, OSC Huyser and DHEC discovered a 12-inch pipe discharging industrial wastewater to a storm water drain that empties into the Pee Dee River. The rate of discharge was estimated at approximately 4,000 gallons per day. A discharge from any container at the facility will reach the Pee Dee River which is an active recreational waterway and serves as a drinking water source for the City of Florence.

300.415(b)(2)(ii): Actual or potential contamination of drinking water supplies or sensitive ecosystems; A discharge from any container at the facility will reach the Pee Dee River which serves as a drinking water source for the City of Florence.

300.415(b)(2)(iii): Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release; OSC Huyser documented the presence of at least 300 drums plus approximately 100 other totes, cylinders and other containers at the Site. An updated tank inventory indicated 31 tanks which contain at least some material, including an 800,000-gallon tank of 5% caustic which remains over 30% full. Primary hazardous substances identified during the RSE include caustics, acids and oxidizers. Sodium Hydroxide and Acetic Acid are listed as CERCLA hazardous substances under 40 CFR section 302, Table 302.4. The facility is attended by a single security guard and a part-time facility manager; the scale of the Site, at 234 acres, means that a discharge is not likely to be detected by on-site personnel.

300.415(b)(2)(vii): The availability of other appropriate federal or state response mechanisms to respond to the release; The State of South Carolina does not currently have sufficient funding to complete a response or removal action at the Site. The EPA has initiated discussions with Potentially Responsible Parties (PRP) who may be able to conduct some of the needed removal activities. The EPA Region 4 Superfund Enforcement Section continues to investigate the existence, liability and viability of additional PRPs.

The RSE has identified hazardous substances at the Site which pose a threat of release. Based on the criteria listed above, the EPA Region 4 ERRPB recommends that the Site be considered for a time-critical removal action to remove and/or prevent migration of hazardous substances, pollutants and contaminants.

CONCUR: _____

James W. Webster, Ph.D., Chief, ERRPB

DATE: 04/11/2018

NON-CONCUR: _____

James W. Webster, Ph.D., Chief, ERRPB

DATE: _____